



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 20, 2012

ROBERT B. ASHER, TREASURER
KEYSTONE ALLIANCE POLITICAL ACTION
COMMITTEE
PO BOX 3883
PHILADELPHIA, PA 19146

Response Due Date
12/26/2012

IDENTIFICATION NUMBER: C00432096

REFERENCE: AMENDED YEAR-END REPORT (07/01/2011 - 12/31/2011), RECEIVED
02/28/2012

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Your Amended Year-End Report (7/1/09 - 12/31/09), received 3/31/11, Amended July Quarterly Report (4/1/10 - 6/30/10), received 8/19/11, Amended October Quarterly Report (7/1/10 - 9/30/10), received 8/19/11, Amended Mid-Year Report (1/1/11 - 6/30/11), received 2/27/12, and Amended Year-End Report (7/1/11 - 12/31/11), received 2/28/12, disclose a substantial increase in certain categories of receipts and disbursements from the amounts disclosed on your original reports (see attached). Please amend your report(s) or provide an explanation to clarify why this additional activity was not provided with your original reports. (11 CFR § 104.3)
2. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the

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excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than

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just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1162.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Butler', with a stylized, cursive script.

David Butler
Senior Campaign Finance Analyst
Reports Analysis Division

Keystone Alliance Political Action Committee (C00432096)*Overview of Additional Receipts*

| Report Name | Total Additional Receipts | Line Number(s) |
|--|----------------------------------|-----------------------|
| 2010 July Quarterly/Amended 2010 July Quarterly, received 8/19/11 | \$1,250.00 | 11(a)(i) |
| 2010 October Quarterly/Amended 2010 October Quarterly, received 8/19/11 | \$7,500.00 | 11(a)(i) |
| Total Additional Receipts | <u>\$8,750.00</u> | |

Overview of Additional Disbursements

| Report Name | Total Additional Disbursements | Line Number(s) |
|--|---------------------------------------|-----------------------|
| 2009 Year-End/Amended 2009 Year-End, received 3/31/11 | \$5,000.00 | 28(a) |
| 2011 Mid-Year/Amended 2011 Mid-Year, received 2/27/12 | \$20,000.00 | 23 |
| 2011 Year-End/Amended 2011 Year-End, received 2/28/12 | \$15,000.00 | 23 |
| Total Additional Disbursements | <u>\$40,000.00</u> | |

Total Increase in Activity on Amended Reports: \$48,750.00

Excessive Contributions from Individuals
Keystone Alliance Political Action Committee (C00432096)

| Contributor Name | Date | Amount | Report |
|------------------|--------|-------------|---------------|
| Harold Schaeffer | 8/1/11 | \$10,000.00 | 2011 Year-End |